

### **REMARKS/ARGUMENTS**

Prior to entry of this amendment, claims 1-3, 5, 6, 9-11, 13-16, 20, 21, 23-26, 30, 31, 33-36 and 39-46 were pending in this application. No claims have been amended, no claims have been added, and no claims have been canceled herein. Therefore, claims 1-3, 5, 6, 9-11, 13-16, 20, 21, 23-26, 30, 31, 33-36 and 39-46 are now pending in this application. The Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

#### **35 U.S.C. §103 Rejection, Cheng in view of McNally**

Claims 1-3, 5, 6, 9-11, 13-16, 20, 21, 23-26, 30, 31, 33-36, and 39-46 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 6,067,548 to Cheng (hereinafter "Cheng") in view of U.S. Patent No. 6,823,513 B1 to McNally et al. (hereinafter "McNally"). The Applicants respectfully submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, as will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. More specifically, neither reference, alone or in combination, teaches or suggests receiving a request to perform a task pertaining to a target identity profile and performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as

recited in each independent claim. That is, the references do not teach or suggest allowing a user to select between available workflows for affecting an identity profile when making a request to do so.

Cheng is directed to "a dynamic organizational information system, an underlying methodology and organization model, along with its system architecture and user interfaces as a comprehensive tool to model an enterprise for collaborative computing." (Col. 5, lines 46-50) More specifically, Cheng "provides a unique dynamic inter-relationship that is expressed by using regular expressions over member attributes and contextual variables. The relationship model is important in supporting collaborative software such as workflow, for authentication, authorization and dynamic job assignment." (Col. 5, lines 53-58) That is, Cheng teaches dynamically determining who is assigned to perform parts of a workflow based on the dynamic relationship between members. "This provides better support of organization management and makes dynamic task re-routing in a workflow system possible in case a resource is absent from its duty." (Col. 5, lines 63-65)

However, Cheng does not teach or suggest receiving a request to perform a task pertaining to a target identity profile and performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as recited in each independent claim. That is, Cheng does not teach or suggest allowing a user to select between available workflows for affecting an identity profile when making a request to do so. Rather, Cheng teaches dynamically determining who is assigned to perform parts of a workflow. The Applicants note that the Office Action indicates that "Cheng does not explicitly teach that the GUI reports a set plurality of workflows to perform a task to the user and receives a selection of the workflow from the user." The Office Action then introduces McNally in an attempt to demonstrate such a teaching.

McNally is directed to "limiting access to resources to each of a plurality of operators having assigned activities in an overall workflow distribution, to computer resources needed to respectively complete each activity through a computer controlled interactive display interface." (Col. 2, lines 54-59) That is, McNally describes an interface through which a user can access resources for performing an assigned workflow. (See e.g., col. 3, lines 3-6) However, McNally does not teach or suggest, alone or in combination with Cheng, receiving a request to perform a task pertaining to a target identity profile and performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as recited in each independent claim. That is, McNally does not teach or suggest allowing a user to select between available workflows for affecting an identity profile when making a request to do so. Rather, McNally teaches an interface through which a user can access resources for performing an assigned workflow. The Office Action specifically cites FIGs. 5-8 of McNally in an attempt to demonstrate allowing a user to select between available workflows for affecting an identity profile. However, these figures do not seem to include any elements for selecting between a plurality of workflows.

The combination of references is no more relevant to the pending claims than either reference alone since neither Cheng nor McNally teach or suggest, alone or in combination, performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as recited in each independent claim. Rather Cheng teaches dynamically determining who is assigned to perform parts of a workflow while McNally teaches an interface through which a user can access resources for performing an assigned workflow.

Claim 1, upon which claims 2-11, 13, and 34-36 depend, claim 14, upon which claims 15-21 and 23 depend, and claim 24, upon which claims 25-31 and 33 depend, each recite in part "identifying a plurality of workflows that perform said task and are associated with

groups that include said target identity profile, said plurality of workflows includes said first workflow, reporting said plurality of workflows to a user via a Graphical User Interface (GUI), receiving from the user via the GUI a selection of said first workflow from the plurality of workflows, and performing one or more steps of said first workflow." Neither Cheng nor McNally teach or suggest, alone or in combination, performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as recited in each independent claim. Rather Cheng teaches dynamically determining who is assigned to perform parts of a workflow while McNally teaches an interface through which a user can access resources for performing an assigned workflow. For at least these reasons, the rejection is improper and claims 1-11, 13-21, 23-31, and 33-36 should be allowed.

Similarly, claim 39, upon which claims 40-46 depend, recites in part "identifying a plurality of workflows that perform the task and are associated with groups that include the user associated with the target identity profile; reporting the plurality of workflows via a Graphical User Interface (GUI) in response to the request; receiving a user selection of a first workflow from the plurality of workflows via the GUI and performing a first step of said first workflow with a first program to affect the target identity profile." Neither Cheng nor McNally teach or suggest, alone or in combination, performing a workflow associated with a target identity profile including reporting a plurality of workflows to a user via a Graphical User Interface (GUI) and receiving from the user via the GUI a selection of a workflow from the plurality of workflows as recited in each independent claim. Rather Cheng teaches dynamically determining who is assigned to perform parts of a workflow while McNally teaches an interface through which a user can access resources for performing an assigned workflow. For at least these reasons, the rejection is improper and claims 39-46 should be allowed.

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### **CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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